

GABROY | MESSER
170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

Christian Gabroy, Esq.
Nev. Bar No. 8805
Kaine Messer, Esq.
Nev. Bar No. 14240
GABROY | MESSER
The District at Green Valley Ranch
170 South Green Valley Parkway
Suite 280
Henderson, NV 89012
Tel. (702) 259-7777
Fax. (702) 259-7704
christian@gabroy.com
kmesser@gabroy.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HELEN MOJTEHEDI, and individual

Plaintiff(s),

vs.

CHRISTIAN DURANTE d/b/a and a/k/a
DURANTE INSURANCE and FINANCIAL
SERVICES also d/b/a and a/k/a
DURANTE AGENCY; DOES 1 through 10
and ROE Corporations 11 through 20,

Defendant(s).

Case No: 2:23-cv-00402-JCM-DJA

**STIPULATION AND ORDER TO EXTEND
DEADLINE FOR PLAINTIFF TO FILE
RESPONSE TO DEFENDANT'S MOTION
TO DISMISS PLAINTIFF'S COMPLAINT**

(First Request)

**STIPULATION AND ORDER TO EXTEND DEADLINE FOR PLAINTIFF TO FILE
RESPONSE TO DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

It is hereby stipulated by and between Plaintiff Helen Mojtehed, ("Plaintiff") through her counsel Christian Gabroy, Esq. and Kaine Messer, Esq. of Gabroy | Messer, and Defendant Christian Durante d/b/a and a/k/a Durante Insurance and Financial Services also d/b/a and a/k/a Durante Agency ("Defendant") through its counsel Jill Garcia, Esq. and Kelly B. Stout, Esq. of Hone Law, shall have an extension up to and including April 18, 2023, for Plaintiff to file her response to Defendant's Motion to Dismiss (ECF No. 7). This is the first request for extension to file response to Defendant's Motion to Dismiss Plaintiff's Complaint. This stipulation is submitted per LR IA 6-1 and based upon the following:

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1 1. The Plaintiff filed her Complaint on or about February 2, 2023, in the Eighth
2 Judicial District Court.

3 2. Defendant removed this matter to the United States District Court on or
4 about March 14, 2023.

5 3. Defendant filed his Motion to Dismiss Plaintiff's Complaint on or about
6 March 21, 2023.

7 4. Plaintiff's Response is currently due on or about April 4, 2022.

8 5. This is the first request for an extension of time for the Plaintiff to file her
9 Response to Defendant's Motion to Dismiss Plaintiff's Complaint.

10 6. This request for extension is made in good faith, with good cause, and not
11 for the purpose of delay but rather to conduct due diligence. Further, Plaintiff's counsel
12 has prior scheduled travel commitments, needs to tend to personal family matters
13 including matters relating to his father's medical prognosis, his ongoing legal matters,
14 and requires the extension to conduct due diligence and potentially streamline various
15 issues.

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7. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

IT IS SO STIPULATED.

DATED this 4th day of April, 2023

Respectfully submitted,

/s/ Christian Gabroy

Christian Gabroy
Nev Bar No. 8805
Kaine Messer
Nev. Bar No. 14240
GABROY | MESSER
The District at Green Valley Ranch
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Suite 280
Henderson, NV 89012
Tel. (702) 259-7777
Fax. (702) 259-7704
christian@gabroy.com
kmesser@gabroy.com

Attorneys for Plaintiff

/s/ Jill Garcia

Jill Garcia
Nev. Bar No. 7805
Kelly B. Stout
Nev. Bar No. 12105
HONE LAW
701 North Green Valley Parkway
Suite 200
Henderson, NV 89704
Tel. (702) 608-3720
Fax. (702) 608-7814
jgarcia@hone.law
kstout@hone.law

Attorneys for Defendant

IT IS SO ORDERED April 5, 2023.


UNITED STATES DISTRICT JUDGE